

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: LIQUID ALUMINUM  
SULFATE ANTITRUST LITIGATION**

Civil Action No. 16-md-2687-JLL-JAD

*This Document Relates to  
Indirect Purchaser Plaintiffs*

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**DECLARATION OF MARVIN A. MILLER IN SUPPORT OF INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF EXPENSES AND FOR AWARD  
OF INCENTIVE PAYMENTS TO CLASS REPRESENTATIVES**

Marvin A. Miller, declares and states:

1. I am one of the Co-Lead Counsel for the Indirect Purchaser Plaintiffs and make this declaration based on my personal knowledge and if called as a witness I would be competent to testify and would testify to the facts contained herein.
2. During the course of this litigation, I have been responsible for the payment of invoices reasonably incurred for the prosecution of the case. As of this date, Co-Lead Counsel have incurred certain external expenses for which we seek reimbursement at this time. Those expenses are as follows:
  - (a) expert witness analysis expenses in the sum of \$982,519.80;
  - (b) the cost of third-party database hosting vendors in the sum of \$231,607.67;
  - (c) the cost of implementing the Notice Plan approved by this Court and disseminating Notice to the Class (using A.B. Data, Ltd.), in the sum of \$77,712.57;
  - (d) transcripts in the sum of \$2,686.13; and
  - (e) mediation and Special Master expenses (Pilgrim Mediation Group and Hochberg ADR, respectively) in the sum of \$45,305.00.

3. Based upon my experience, these categories of expenses are the type routinely charged to hourly-fee paying clients in preparation for a modern-day antitrust case of this size and scope.

The foregoing is true and correct and is executed under the penalties of perjury pursuant to the laws of the United States in Chicago, IL on August 17, 2018.

*s/Marvin A. Miller*

Marvin A. Miller